

REMARKS

This Application has been carefully reviewed in light of the Office Action mailed March 3, 2005. Claims 1-3 and 5-33 were pending in the Application. In the Office Action, Claims 1-3 and 5-33 were rejected. Claims 1-3 and 5-33 remain pending in the Application. Applicants respectfully request reconsideration and favorable action in this case.

In the Office Action, the following actions were taken or matters were raised:

SECTION 103 REJECTIONS

Claims 1-3, 5-11 and 26-33 were rejected under 35 U.S.C. 103(a) as being unpatentable over U.S. Patent No. 6,016,401 issued to Rostoker et al. (hereinafter "*Rostoker*") in view of U.S. Patent No. 5,515,511 issued to Nguyen et al. (hereinafter "*Nguyen*"). Claims 12-25 were rejected under 35 U.S.C. 103(a) as being unpatentable over U.S. Patent No. *Rostoker* in view of *Nguyen* and further in view of U.S. Patent No. 6,304,895 issued to Schneider (hereinafter "*Schneider*"). Applicants respectfully traverse these rejections.

To establish a *prima facie* case of obviousness under 35 U.S.C. § 103, three basic criteria must be met: First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings; second, there must be a reasonable expectation of success; and finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. *In re Vaeck*, 947 F.2d 488, (Fed. Cir. 1991); M.P.E.P. § 2143.

Applicants respectfully submit that the Examiner has failed to establish a *prima facie* case of obviousness for the present Application. *Rostoker* appears to disclose a digital video network apparatus 300 for transferring data streams representing compressed video and audio over a network and/or receiving data streams from the network which comprise compressed video data, decode and decompress the data, and output the images and full motion video (*Rostoker*, column 7, lines 32-48, figure 1). *Rostoker* also appears to disclose that the network apparatus 300 includes MPEG compression/decompression encoder/decoder circuits

329 having an MPEG video decoder 344 where the video decoder 344 is coupled to RAM 346 which is used to store frames of video during decoding operations (*Rostoker*, column 27, lines 22-36, 60-66, figure 3). Applicants' independent Claim 1 recites, at least in part: "A graphics adapter, comprising . . . a frame buffer . . . and a network chip coupled to the frame buffer" (emphasis added). In the Office Action, the Examiner states that *Rostoker* discloses the claimed features of Applicants' claims and refers to "[i.e., 'Frame memories'; 346] operable to store graphics image data" as apparently equivalent to "a frame buffer" as recited by independent Claim 1 (Office Action, page 3). The Examiner does not explicitly identify what the Examiner considers to be the "graphics adapter" in *Rostoker*. However, based on the Examiner's above-referenced statement regarding the "[f]rame memories 346" of *Rostoker*, and at least because the "frame memories 346" of *Rostoker* form part of the network apparatus 300 of *Rostoker*, the Examiner appears to consider the network apparatus 300 of *Rostoker* as the "graphics adapter" recited by independent Claim 1. The Examiner also states:

Rostoker discloses . . the claimed feature of a graphics adapter, comprising: a frame buffer . . . and a network chip [300] coupled to the frame buffer [346], the network chip comprising: a compression unit . . . and a network interface."

(Office Action, page 3)(emphasis added). Thus, the Examiner appears to consider the "network apparatus 300" of *Rostoker* as both the "graphics adapter" and the "network chip" recited by Applicants' independent Claim 1, which is an improper claim construction. Further, Applicants respectfully submit that the "network apparatus 300" of *Rostoker* is clearly not a "network chip" as recited by Applicants' independent Claim 1. Moreover, *Nguyen* does not remedy at least this deficiency of *Rostoker*. Accordingly, for at least these reasons, independent Claim 1 is patentable over the cited references.

Additionally, the Examiner states that *Rostoker* does not explicitly disclose "a frame buffer operable to store graphics image data rendered by the graphics adapter" (Office Action, page 3)(emphasis in original). However, the Examiner also states that "such limitation is shown in the teaching of *Nguyen* [i.e. C-box [a graphics adapter in recited claim] includes network unit [103-105], compression unit [112-114] and graphics unit [108-109], where

graphics unit performs various image processing operation]” (Office Action, page 3)(emphasis in original). Applicants respectfully submit that *Nguyen* does not appear to disclose or even suggest such “rendering,” nor has the Examiner explicitly identified any such disclosure in *Nguyen*. The “graphics unit [108-109]” referred to by the Examiner in the Office Action appears to correspond to the “special effects unit 109” of *Nguyen*, and the Examiner appears to be relying on a portion of *Nguyen* which recites “[t]he special effects unit 109 provides hardware support for the various image processing operations” (*Nguyen*, column 4, lines 18-26 (also referenced by the Examiner)(emphasis added)). Applicants respectfully submit that such a general, non-descriptive disclosure does not rise to the level required to support a rejection of the claims of the present Application pursuant to the courts or the M.P.E.P. Accordingly, for at least this reason also, Applicants respectfully submit that the rejection of independent Claim 1 is improper and should be withdrawn.

Independent Claim 12 recites, at least in part, “logically dividing a frame buffer of a graphics adapter into a plurality of segments, at least one segment of said plurality of segments storing graphics image data rendered by the graphics adapter and corresponding to a particular destination device of a plurality of destination devices” (emphasis added), independent Claim 19 recites, at least in part, “comparing graphics image data of a new image for a particular destination device . . . with graphics image data of a previous image for said particular destination device stored in a frame buffer of a graphics adapter remote from said particular destination device, said graphics adapter rendering said graphics image data for said new image and said previous image” (emphasis added), independent Claim 26 recites, at least in part, “a frame buffer operable to store graphics image data” and “a network attachable graphics chip coupled to said frame buffer, said network attachable graphics chip comprising . . . a graphics unit operable to render a graphics image, said graphics unit further operable to provide graphics image data relating to said rendered image to said frame buffer” (emphasis added), and independent Claim 29 recites, at least in part, “a graphics unit adapted to render graphics image data,” “a frame buffer operable to store said graphics image data” and “a network interface operable to receive at least a portion of said graphics image data from said frame buffer” (emphasis added). At least for the reasons discussed above in connection with independent Claim 1, Applicants respectfully submit that independent Claims 12, 19, 26 and

29 are also patentable over the cited references. Further, *Schneider* does not appear to remedy the deficiencies of either *Rostoker* or *Nguyen*, alone or in combination.

Therefore, Claims 1-3, 5-11 and 26-33 are in condition for allowance, and Applicants respectfully request that the rejection of Claims 1-3, 5-11 and 26-33 be withdrawn.

CONCLUSION

Applicants have made an earnest attempt to place this case in condition for immediate allowance. For the foregoing reasons and for other reasons clearly apparent, Applicant respectfully requests reconsideration and full allowance of all pending claims.

No fee is believed due with this Response. If, however, Applicants have overlooked the need for any fee due with this Response, the Commissioner is hereby authorized to charge any fees or credit any overpayment associated with this Response to Deposit Account No. 08-2025 of Hewlett-Packard Company.

Respectfully submitted,

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Date: May 25, 2005

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